

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

BRIAN CONWAY individually and on  
behalf of all others similarly situated,

Plaintiff,

v.

MAPFRE U.S.A. CORP. and THE  
COMMERCE INSURANCE COMPANY,

Defendants.

Case No.: 1:23-cv-12076-IT

**JOINT STIPULATION TO EXTEND TIME  
TO RESPOND TO CLASS ACTION COMPLAINT**

IT IS HEREBY STIPULATED and AGREED by and between undersigned counsel,  
pursuant to Federal Rule of Civil Procedure 6(b), that:

1. Defendants MAPFRE U.S.A Corporation's and The Commerce Insurance Company's ("Defendants") time to answer, move, or otherwise respond to Plaintiff's Class Action Complaint filed on or about September 11, 2023 ("Complaint") and served on September 19, 2023, is extended from October 10, 2023 to November 9, 2023.

2. Good cause exists for the agreed extension because Plaintiffs have filed an unopposed Motion to Consolidate multiple related putative class actions brought against Defendants in this Court in the related case, *Ma v. MAPFRE U.S.A Corp., et al.*, No. 1:23-cv-12059 (Dkt. No. 9). That motion also requests a deadline for Plaintiffs to file a Consolidated Complaint and for Defendants to file a responsive pleading to the Consolidated Complaint.

3. This stipulation does not constitute a waiver of any claim, right or defense.

Dated: October 9, 2023

Respectfully submitted,

**PASTOR LAW OFFICE PC**

/s/ Andrew W. Ferich (with permission)

DAVID PASTOR (BBO 391000)  
Email: [dpastor@pastorlawoffice.com](mailto:dpastor@pastorlawoffice.com)  
63 Atlantic Avenue, 3rd Floor  
Boston, MA 02110  
Tel: 617.742.9700  
Fax: 617.742.9701

TINA WOLFSON (pro hac vice to be filed)  
ROBERT AHDOOT (pro hac vice to be filed)  
AHDOOT & WOLFSON, PC  
2600 W. Olive Avenue, Suite 500  
Burbank, CA 91505  
Telephone: (310) 474-9111  
Facsimile: (310) 474-8585  
[twolfson@ahdootwolfson.com](mailto:twolfson@ahdootwolfson.com)  
[rahdoot@ahdootwolfson.com](mailto:rahdoot@ahdootwolfson.com)

ANDREW W. FERICH (admitted pro hac vice)  
AHDOOT & WOLFSON, PC  
201 King of Prussia Road, Suite 650  
Radnor, PA 19087  
Telephone: (310) 474-9111  
Facsimile: (310) 474-8585  
[aferich@ahdootwolfson.com](mailto:aferich@ahdootwolfson.com)

*Attorneys For Plaintiff And The Putative Class*

**BAKER & HOSTETLER LLP**

/s/ James H. Rollinson

---

James H. Rollinson (SBN 649407)  
[jrollinson@bakerlaw.com](mailto:jrollinson@bakerlaw.com)

Key Tower  
127 Public Square, Suite 2000  
Cleveland, OH 44114-1214  
Telephone: 216.621.0200  
Facsimile: 216.696.0740

*Attorneys for Defendants*